From: McArthur, Lisa
To: Valdez, Heather

Subject: RE: Pond 15S NW Standpipe Replacement Project - Daily Report #4

Date: Monday, May 09, 2016 2:17:23 PM

Thanks for the photos and short trip report – I'm glad it was a success.

Lisa McArthur RCRA Program Unit Manager Office of Air, Waste and Toxics EPA Region 10 (206) 553-1814 mcarthur.lisa@epa.gov

From: Valdez, Heather

Sent: Monday, April 25, 2016 11:02 AM **To:** McArthur, Lisa < McArthur.Lisa@epa.gov>

Subject: Fw: Pond 15S NW Standpipe Replacement Project - Daily Report #4

Hi Lisa, how are you? I hope your trip is going well. I am back and my trip did go very well. There are some of the key photos from the work attached. They found the damage (a little more than FMC expected, but what the Tribe has always been worried about) and made the repair without having any detectable issues with high phosphine release to the surrounding ambient air. So the repair project was successful. The impenetrable liner that is in the cap (above where the damaged pipe was, therefore needed to be cut open) is already repaired and leak tested. There is still some finishing up work to rebuild the upper layers of the cap that are above that liner. Tim Norman, the CERCLA oversight contractor who works for Jonathan was helping me out while I was there and is continuing to observe the finishing steps, and he has provided me with good notes. So that is very nice.

I was able to connect really well with Susan and Kelly from the Tribe while there.
I connected with Greg more, learning a lot from him about my RPM type duties and how to do oversight work. I got more comfortable getting around Pocatello, out to where the FMC site is, and around the site, on my own. I learned more about what was going on, on the larger CERCLA site, which I find helpful. I connected with the contractors like Tim Norman, working for EPA on the CERCLA remedial work, who I also learned a lot from, about oversight work. I was helpful to Tim N. as well, because he had always wanted to understand better what was going on at the RCRA ponds. I really connected well with some of the key people from FMC. I think I went a long way with the relationship building all around, so total success there.

Take care, have a good time at your meetings.

Heather Valdez
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From: Brian.English@deq.idaho.gov < Brian.English@deq.idaho.gov >

Sent: Friday, April 22, 2016 8:14 AM

To: Weigel, Greg **Cc:** Valdez, Heather

Subject: FW: Pond 15S NW Standpipe Replacement Project - Daily Report #4

Wow. The event and resulting damage were more significant than expected. I think this clearly demonstrates why keeping well below the LEL is appropriate, especially given damage to HDPE and the drainage pipe. Good this is being repaired. This indicates the Pond monitoring must be robust to ensure the PH3 level never approaches the LEL.

From: Rob Hartman [mailto:Rob.J.Hartman@mwhglobal.com]

Sent: Friday, April 22, 2016 8:43 AM

To: Greg Weigel

Cc: 'Kelly Wright'; 'susanh@ida.net'; Brian English; Al Lam; Mark Smith; Vannoy, Jim A. - CO 6th;

Williams, Jonathan; Marquerite Carpenter; Valdez. Heather@epa.gov; Gary Resh;

rachel.greengas@fmc.com; Ross, Carrie

Subject: Pond 15S NW Standpipe Replacement Project - Daily Report #4

Greg:

Pond 15S GCP Replacement of NW Standpipe Project - Daily Report # 4

Date: April 21, 2016

- 1. Progress achieved today: Completed Procedures 12 thru 16.
- 2. Procedure steps planned to be completed during the next work day: Procedures 17 thru 20. Investigate the extent of the cap drainage collection piping heading in the easterly direction.
- 3. Any problems or unexpected conditions encountered:
- As reported to the EPA OSC on 4/20/16 and discussed during two telephone conferences with the OSC on 4/21/16, a damaged section of the ET cap drainage pipe was encountered in the anchor trench collection/drainage layer where the old standpipe connection pipe crossed over the anchor trench and laterally over the width of the excavation. There was also thermal damage to the HDPE liner where the lateral pipe penetrated (originally boot-sealed) the HDPE. The drainage pipe damage is being managed following the same procedures as for the Contingency Plan for Damaged or Deteriorated Perimeter Pipe. The west extent of the damage

was located and competent pipe was located at the west edge of the excavation and the east extent will be explored to find competent pipe before replacing the damaged pipe with a new section of 6-inch corrugated HDPE pipe. The damaged section of HDPE (and other geosynthetic components) will be repaired following the same procedures as the repairs for the new standpipe penetration through the geosynthetic layers.

- When completing Procedure 15, a short (about 2 feet including the old T-joint) section of the perimeter perforated collection pipe that was thermally damaged was encountered at the old pipe connection. This initiated the Contingency Plan for Damaged or Deteriorated Perimeter Pipe. Per this contingency plan, the damaged section of the perforated 2" pipe and T-joint were removed and replaced with new PVC pipe prior to installing the new tee joint and connecting the new vertical 2" solid wall PVC pipe riser.
- 4. Any triggering of contingency actions: The Contingency Plan for Damaged or Deteriorated Perimeter Pipe was triggered as noted above.

Start of project work day continuous monitor 15S-1 results taken at 0606 hrs. All TWA, Max and Current readings were 0.00 ppm. Start of project work day 4/21/16 ground level monitoring results were all 0.00 ppm. Continuous monitor 15S-1 monitor turned on at end of project work day at 1552 hrs. Procedure 12 monitoring was 0.00 ppm.

Photographs attached:

- 1. Lateral Connection to Perimeter Pipe (Procedure 14).
- Replacement PVC and New Tee (Procedure 15).
- 3. New 2" Standpipe with Cap (Procedure 16).